

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re Cattle and Beef Antitrust Litigation

Case No. 22-md-3031(JRT/JFD)

This Document Relates to:

**JBS DEFENDANTS’ RESPONSE
TO PLAINTIFF SYSCO
CORPORATION’S MOTION
FOR LIMITED STAY**

Sysco Corporation v. Cargill, Inc., et al.
Case No. 22-cv-1750

As a courtesy given the unusual circumstances outlined in Sysco’s motion, Defendants JBS USA Food Company, JBS Packerland, Inc., Swift Beef Company, and JBS S.A. (the “JBS Defendants”) would not oppose a stay of 30 days (or less) of deadlines applicable to Sysco in order to allow Sysco to retain new counsel.

As the Court may recall, the numerous parties to this complex multidistrict litigation—including Sysco—recently stipulated to a brand new schedule for the entire case that the Court entered on January 24, 2023. *See* ECF No. 129. In order to hopefully keep that overall schedule in place, and because Sysco has not provided sufficient information to justify a 60-day stay, the JBS Defendants believe that a stay of 30 days (or less) for Sysco would strike the right balance between meeting Sysco’s need to retain new counsel and keeping the parties on track with the new schedule recently set by the Court. Sysco could then update the Court at the end of the 30-day period as to the status of its efforts to retain new counsel.

Dated: March 17, 2023

Respectfully Submitted,

/s/ Randi J. Winter

Donald G. Heeman, Reg. No. 0286023

Jessica J. Nelson, Reg. No. 0347358

Randi J. Winter, Reg. No. 0391354

SPENCER FANE

100 South Fifth Street, Suite 2500

Minneapolis, MN 55402

Tel.: (612) 268-7000

dheeman@spencerfane.com

jnelson@spencerfane.com

rwinter@spencerfane.com

Michael B. Carlinsky (*pro hac vice*)

Sami H. Rashid (*pro hac vice*)

Kevin A. Janus (*pro hac vice*)

**QUINN EMANUEL URQUHART &
SULLIVAN LLP**

51 Madison Avenue

New York, NY 10010

Tel.: (212) 849-7000

michaelcarlinsky@quinnemanuel.com

samirashid@quinnemanuel.com

kevinjanus@quinnemanuel.com

Lewis A. Remele, Jr., Reg. No. 90724

Christopher R. Morris, Reg. No. 230613

BASSFORD REMELE, P.A.

100 South 5th Street, Suite 1500

Minneapolis, MN 55402

Tel.: (612) 333-3000

lremele@bassford.com

cmorris@bassford.com

William F. Hargens (*pro hac vice*)
Patrick E. Brookhouser, Jr. (*pro hac vice*)

**MCGRATH NORTH MULLIN &
KRATZ, PC LLO**

First National Tower, Suite 3700
1601 Dodge Street
Omaha, NE 68102
Tel: (402) 341-3070
whargens@mcgrathnorth.com
pbrookhouser@mcgrathnorth.com

***Counsel for Defendants JBS USA Food
Company, JBS Packerland, Inc., Swift
Beef Company, and JBS S.A.***